

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

KEVONGH J. GRANT

Plaintiff,

v.

APTIM ENVIRONMENTAL AND  
INFRASTRUCTURE, INC., WITT O'BRIEN'S, LLC,  
ODEBRECHT CONSTRUCTION, INC., NATHAN  
McCANN, ANDRES McCANN, JOHN DOES, JANE  
DOES AND UNKNOWN CORPORATIONS

Defendants.

**Case. No. 1:19-CV-0025**

**NOTICE OF FILING STATEMENT OF UNDISPUTED FACTS**

Defendant APTIM Environmental and Infrastructure, LLC (f/k/a APTIM Environmental and Infrastructure, Inc.)(“APTIM”), by and through its undersigned counsel Dudley Newman Feuerzeig LLP hereby files its Notice of Filing Statement of Undisputed Facts without Exhibits. The Statement is attached hereto as **Exhibit 1**.

Respectfully submitted,

**DUDLEY NEWMAN FEUERZEIG LLP**

**DATED:** February 27, 2023

By: /s/ Alex M. Moskowitz  
**ALEX M. MOSKOWITZ** (V.I. Bar No. 1072)  
**CRAIG M. O'SHEA** (V.I. Bar No. R2072)  
Law House  
1000 Frederiksberg Gade  
St. Thomas, VI 00802  
Telephone: (340) 774-4422  
E-Mail: [amoskowitz@dnfvi.com](mailto:amoskowitz@dnfvi.com)  
E-Mail: [coshea@dnfvi.com](mailto:coshea@dnfvi.com)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this the 27<sup>th</sup> day of February, 2023, I caused the foregoing “**Notice of Statement of Undisputed Facts**” to be electronically filed with the Court’s ECF/CMF system which will send notification of same to the attorney listed below:

DIANE M. RUSSELL, ESQ.  
LAW OFFICES OF DIANE M. RUSSELL, PC  
9273 ESTATE CLIFTON HILL KINGSHILL  
ST. CROIX, VI 00850  
[RUSSELL.DIANE1@GMAIL.COM](mailto:RUSSELL.DIANE1@GMAIL.COM)

/s/ Alex M. Moskowitz